
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Leda Dunn Wettre, U.S.M.J.
	:	
v.	:	
	:	Mag. No. 19-8444
ALEXIS HERNANDEZ-REYNOSO,	:	
JACK MITCHELL,	:	
PETER TRIPET,	:	
ANTHONY MACDONALD, and	:	
CHRISTOPHER ODONITS	:	CRIMINAL COMPLAINT


I, Sean P. Abrusci, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the United States Department of Justice, Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


Sean P. Abrusci, TFO
U.S. Department of Justice, Drug
Enforcement Administration

November 21, 2019
Date

at Essex County, New Jersey
County and State

Honorable Leda Dunn Wettre
United States Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Crystal Meth)

On or about November 20, 2019, in the District of New Jersey and elsewhere, defendants,

ALEXIS HERNANDEZ-REYNOSO,
JACK MITCHELL,
PETER TRIPET,
ANTHONY MACDONALD, and
CHRISTOPHER ODONITS

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Sean P. Abrusci, am a Task Force Officer with the United States Department of Justice, Drug Enforcement Administration ("DEA"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, statements from confidential sources and other participants in the scheme, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. I have not set forth each and every fact that I know concerning this investigation because this Affidavit is being submitted for the limited purpose of establishing probable cause to support this Criminal Complaint and the issuance of an Arrest Warrant. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

THE INVESTIGATION

1. Special Agents of the Drug Enforcement Administration (the "DEA") are investigating a drug trafficking organization ("DTO") operating in New Jersey, New York, and elsewhere. During the investigation, the DEA learned that defendants Alexis Hernandez-Reynoso ("Reynoso") and Jack Mitchell ("Mitchell") distributed narcotics to co-conspirators in New York and New Jersey.
2. During the investigation, the DEA learned that Reynoso and Mitchell had shipped a package of crystal meth to an apartment located in midtown Manhattan (the "Apartment").
3. Then, on or about November 20, 2019, after confirming that Reynoso resided in the Apartment, the DEA initiated surveillance in the vicinity of the Apartment. A short time later, the DEA observed Reynoso exit his Apartment building with a large bag. DEA agents approached Reynoso and identified themselves as law enforcement. In response, Reynoso dropped to the ground with his bag. DEA agents then asked Reynoso about the contents of his bag. Reynoso stated that he had about a pound of crystal meth in his bag.
4. Reynoso then provided the DEA with written consent to search his Apartment. In the Apartment, the DEA encountered Mitchell and recovered scales, ledgers, and small plastic bags. In my training and experience, such items are used by narcotics distributors to package drugs for sale. Reynoso and Mitchell were placed under arrest.
5. The substances recovered from Reynoso's bag on or about November 20, 2019, weighed approximately 250 grams and field tested positive for methamphetamine.

6. While the DEA processed the Apartment, an unknown male later identified as defendant Peter Tripet ("Tripet") rang the Apartment doorbell. Agents presented at the entrance of the Apartment building, identified themselves as law enforcement, and asked Tripet if he had narcotics on his person. Tripet stated that he did, and provided verbal consent for the search of his bag, which contained approximately 27 grams of suspected crystal meth. Tripet was placed under arrest. The DEA later learned that Tripet served as a narcotics broker for Reynoso and Mitchell.

7. The substances recovered from Tripet's bag on or about November 20, 2019, field tested positive for methamphetamine.

8. After further investigation, the DEA arrived at a hotel where Anthony MacDonald ("MacDonald") was waiting in the lobby with a large bag. The DEA approached MacDonald, identified themselves as law enforcement, and asked MacDonald about the contents of his bag. MacDonald falsely responded that the bag belonged to someone else.¹ The DEA asked MacDonald for consent to search the bag. MacDonald initially refused, but ultimately allowed the DEA to view the contents of the bag. In the bag, agents observed in plain view what appeared to be packaged crystal meth. Agents then conducted a full search of the bag and recovered approximately 105 grams of suspected crystal meth. MacDonald was placed under arrest. The DEA later learned that MacDonald was aware that he was supplying crystal meth to Reynoso and Mitchell.

9. The substances recovered from MacDonald's bag on or about November 20, 2019, field tested positive for methamphetamine.

10. After further investigation, the DEA arrived at a hotel where Odonits was staying. The DEA knocked on Odonits's hotel room door and Odonits answered. The DEA then identified themselves as law enforcement and requested Odonits's consent to search his hotel room. Odonits initially refused, but ultimately provided written consent for the search of his hotel room. The DEA recovered approximately 572 grams of suspected crystal meth from Odonits's hotel room. Odonits was supplying crystal meth to MacDonald.

11. The substances recovered from Odonits's hotel room on or about November 20, 2019, field tested positive for methamphetamine.

¹ Lobby surveillance footage showed only MacDonald in possession of the bag from the time he entered the lobby until he was approached by the DEA.